

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JAMES B. GOODMAN,
Plaintiff,
vs.
PATRIOT MEMORY, LLC.
Defendant.

Civil Action No. 4:14-CV-01360 EW

**Before U.S. District Court Judge
EWING WERLEIN, JR.**

JURY TRIAL DEMANDED

**JAMES B. GOODMAN'S ANSWER TO COUNTERCLAIMS OF
PATRIOT MEMORY, LLC**

Counterclaim Defendant James B. Goodman ("Goodman"), by and through his attorney,
responds to the counterclaims of Patriot Memory, LLC ("Patriot") as follows:

1. Goodman admits the allegation of paragraph 1 of Patriot's counterclaim.
2. Goodman admits the allegation of paragraph 2 of Patriot's counterclaim.
3. Goodman admits the allegation of paragraph 3 of Patriot's counterclaim.
4. Goodman admits the allegation of paragraph 4 of Patriot's counterclaim.
5. Goodman admits the allegation of paragraph 5 of Patriot's counterclaim.
6. Goodman denies the allegation of paragraph 6 of Patriot's counterclaim.
7. Goodman admits the allegation of paragraph 7 of Patriot's counterclaim.
8. Goodman denies the allegation of paragraph 8 of Patriot's counterclaim.

Respectfully submitted,

/s/ David Fink
David Fink
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Document has been served on August 19, 2014 on all counsel of record consenting to the service via the Court's CM/ECF system.

/s/ David Fink
David Fink
Attorney in Charge for the Plaintiff